

**KANTROWITZ GOLDHAMER &  
GRAIFMAN PC**

Gary Graifman, *admitted pro hac vice*  
Melissa Emert, *admitted pro hac vice*  
135 Chestnut Ridge Road, Suite 200  
Montvale, NJ 07645  
Tel: (845) 356-2570  
ggraifman@kgglaw.com  
memert@kgglaw.com

**MIGLIACCIO & RATHOD LLP**

Nicholas Migliaccio, *admitted pro hac vice*  
Jason Rathod, *pro hac vice forthcoming*  
412 H St NE #302  
Washington, D.C. 20002  
Tel: (202) 470-3520  
nmigliaccio@classlawdc.com  
jrathod@classlawdc.com

**FEDERMAN & SHERWOOD**

William B. Federman, *admitted pro hac vice*  
10205 N. Pennsylvania Avenue  
Oklahoma City, OK 73120  
Tel: (405) 235-1560  
wbf@federmanlaw.com

UNITED STATES DISTRICT COURT

NORTHERN DISTRICT OF CALIFORNIA

MICHELLE SALINAS, RAYMEL  
WASHINGTON, and AMANDA GORDON,  
individually and on behalf of all others  
similarly situated,

Plaintiffs,

v.

BLOCK, INC. and CASH APP INVESTING,  
LLC,

Defendants.

Case No. 3:22-cv-04823

**SUPPLEMENTAL DECLARATION  
OF ANGEION GROUP RE:  
SETTLEMENT ADMINISTRATION**

1 I, Ryan Chumley, declare and state as follows:

2 1. I am a Senior Project Manager at the class action notice and claims administration firm  
3 Angeion Group, LLC (“Angeion”). I have personal knowledge of the matters stated herein.

4 2. The purpose of this Supplemental Declaration is to provide the Court with an update  
5 regarding the status of claims processing.

## 6 **STATUS OF CLAIM SUBMISSIONS**

### 7 **Total Claims Submissions**

8 3. As of March 13, 2025, Angeion has received a total of 667,985 Claim Form submissions. This  
9 total includes 432 Claim Forms received by mail that were received after the submission of Angeion’s  
10 previous declaration. The number of Claim Forms that have been received in this Settlement meets  
11 or exceeds the number of claims received in comparable privacy matters Angeion has administered.

### 12 **Status of Late Claims**

13 4. Of the 667,985 Claim Forms received, 1,247 Claim Forms were received after the November  
14 18, 2024 deadline to submit claims. Of these, 585 were timely postmarked, while the remaining  
15 662 were determined to be late due to having a postmark date after the claims deadline. After  
16 consulting with the Parties, Angeion was instructed to accept and process all late claims *as filed*, but  
17 to forgo any deficiency process, as the claims were not timely submitted.

18 5. Angeion reviewed the 662 late claims and has approved 20 of them for a combined total of  
19 \$23,499.95. An additional 77 have been partially approved for a combined total of \$27,288.15. The  
20 remaining claims were not approved for the following reasons: (a) 16 claims have been denied as  
21 being fraudulent; (b) 37 were denied as being duplicative of another claim submitted; and (c) 513  
22 claims were deficient. These 513 deficient claims will be sent a late claim denial notice in the same  
23 form as **Exhibit A** attached hereto.

### 24 **Preliminary Status of Timely Submitted Claims**

25 6. The preliminary review status for the 667,315 timely Claim Forms is outlined in the chart  
26 below, with additional details in the paragraphs that follow.

27

28

Claim Status	Claim Count	Preliminary Loss Amount Approved <sup>1</sup>
Approved	13,900	\$3,050,555.50
Deficient	423,319 <sup>2</sup>	\$2,569,072.73 <sup>3</sup>
Duplicate	838	N/A
Denied	201,616	N/A
Withdrawn by Claimant	11	N/A
Pending Review	27,631	TBD
<b>Totals</b>	<b>667,315</b>	<b>\$5,620,528.23</b>

7. Of the \$5,620,528.23 in losses preliminarily approved for the 13,900 approved and 26,480 partially approved deficient claims, \$2,995,410.05 is for transaction losses, \$2,579,025.00 is for attested time loss and \$46,093.18 is for out-of-pocket losses.

8. Angeion has identified a total of 201,488 claims to be denied as fraudulent. An additional 128 claims will be denied as ineligible based on claimant responses provided on their claim form submission. Of the 423,319 claims deemed deficient, 269,131 claims have been identified as deficient for either (a) not submitting a completed claim form or (b) for not selecting any settlement benefit. A further 154,188 claims have been identified as deficient for one or more other reasons, including failure to submit required documentation or the documentation submitted did not provide evidence of the amount of losses claimed.

9. All claimants with timely claims determined to be deficient will be sent a notice identifying the deficiency and will be afforded an opportunity to remedy the deficiency. As of the date of this declaration, Angeion has sent 269,131 claimants a Deficiency Notice. Claimants who receive a Deficiency Notice will be given 21 days to cure the deficiency by, for example, submitting additional documentation. If a claimant attempts to cure the deficiency but the claim is still deemed deficient, the claimant will be given a final opportunity to cure the deficiency before the claim is denied. Any

<sup>1</sup> All approved loss amounts are *preliminary* and remain subject to final audits and additional deduplication review and quality assurance efforts, the results of which may alter these totals.

<sup>2</sup> A total of 26,480 deficient claims have been preliminarily approved to receive a partial award of the losses claimed.

<sup>3</sup> Deficient claims may have a preliminary approved amount if their submitted claim is partially approvable. For example, if a claim was submitted for \$1,000 in transaction losses and only provided documentation for \$500 of losses, they would still be eligible to receive that amount but would be provided the opportunity to provide further documentation to substantiate their entire claim.

deficient claim that is successfully remedied through this process will be approved and paid. A true and accurate copy of the Deficiency Notice is attached hereto as **Exhibit B**.

10. Angeion has completed its initial review for the 86,379 Transaction Loss online claims received. For the Court's convenience, the chart below includes the current preliminary breakdown of all Transaction Loss Claims.<sup>4</sup> These totals remain subject to change pending the results of ongoing audits and quality assurance review efforts.

Transaction Loss Claimed Amount (Range)	Transaction Loss Claim Count	# Claims Reviewed	# Claims Approved <sup>5</sup>	Preliminary Transaction Loss Amount Approved <sup>6</sup>
\$0.01-\$100.00	19,683	19,683	1,026	\$55,906.20
\$100.01-\$1000.00	41,428	41,428	2,091	\$727,227.45
\$1,000.01-\$10,000.00	24,046	24,046	1,079	\$1,912,891.54
\$10,000.01-\$50,000.00	937	937	9	\$56,508.79
\$50,000.01-\$100,000.00	96	96	4	\$78,596.92
\$100,000.01-\$999,999.99	126	126	1	\$3,000.00
\$1,000,000+	63	63	0	N/A
<b>Totals</b>	<b>86,379</b>	<b>86,379</b>	<b>4,027</b>	<b>\$2,834,130.90</b>

11. Angeion has routinely administered settlements where claims review and processing continue after the time that Final Approval has been granted. This is a common occurrence resulting from the timing of the claim filing deadline in relation to the hearing, combined with the volume of claims received and complexity of review required pursuant to the terms of the settlement.<sup>7</sup>

<sup>4</sup> The dollar amount totals contained herein are solely attributable to Transaction Loss Claims and do not include any additional approved or partially approved totals for attested lost time or out-of-pocket losses.

<sup>5</sup> This includes claims that are at least partially approved for any transaction losses claimed. For example a claim submitted for \$5,000 in transaction losses, may only have provided documentation supporting \$500 of losses. They would be currently approved for that amount and would receive a deficiency notice to provide additional documentation to support the remainder of losses claimed.

<sup>6</sup> The approved transaction loss amount for these claims is based on the initial review and is subject to change based on additional audits of these claims.

<sup>7</sup> See for example: *In re: Facebook Inc. Consumer Privacy User Profile Litigation*, No. 3:18-md-02843 (N.D. Cal.); *Leventhal v. Streamlabs, LLC*, No. 3:22-cv-01330 (N.D. Cal.); *Hough v. Navistar*, No. 2021L001161 (Ill. Cir. Ct.); *Slos v. Select Health Network, Inc.*, No. 71D05-2002-PL-000060 (Ind. Super. Ct.); *Hestrup v. DuPage Medical Group LTD*, No. 2021L000937-350 (Ill. Cir. Ct.); *Goetz v. Benefit Recovery Specialists, Inc.*, No. 2020CV000550 (Wis. Cir. Ct.); *Colston v. Envision Credit Union*, No. 2022CA001476 (Fla. Cir. Ct.); *Bruner v. Southern Illinois Hospital Services*, No. 2023CH14 (Ill. Cir. Ct.); *J.M., et al. v. HealthAlliance, Inc., et al.*, No. 72450/2023 (N.Y. Super. Ct.); *Alexander v. Otis R. Bowen Center for Human Services*, No. 43D04-2104-CT-000019 (Ind. Super. Ct.); *Wolff v. Lower, LLC*, No. 1:22-cv-02003 (N.D. Md.); *Martinez v. Valex Corp.*, No. 56-2022-00572595 (Cal. Super. Ct.); *Hartman v. Monarch Recovery Management, Inc.*, No. 2:15-cv-01364

12. Angeion will continue to review, and process claim submissions in an expeditious manner, and will keep the Parties apprised of the progress made to review claims, including the deficiency process.

**ESTIMATED NOTICE AND ADMINISTRATION COSTS**

13. Through January 31, 2025, the cost to provide notice and administration services has totaled \$1,276,985.92. As previously reported to the Court, Angeion estimates that the total cost to provide notice and administration services for this settlement will be approximately \$1,515,687.00.

I hereby declare under penalty of perjury that the foregoing is true and correct.

Dated: March 17, 2025

  
RYAN CHUMLEY

---

(W.D. Pa.); *Paul v. Rogers Behavioral System, Inc.*, No. 2023cv001572 (Wis. Cir. Ct.); *Esposito, et al. v. Cellco Partnership d/b/a Verizon Wireless*, No. MID-L-6360-23 (N.J. Super. Ct.); *Dickerson, et al. v. York International Corp.*, et al., No. 1:15-cv-01105 (M.D. Pa.); *Cole, et al. v. NIBCO, Inc.*, No. 3:13-cv-07871; *Matson, et al. v. NIBCO, Inc.*, No. 5:19-cv-00717 (W.D. Tex.); *In re: Allura Fiber Cement Siding Products Liability Litigation*, No. 2:19-mn-02886 (D.S.C.); *Cox v. Spirit Airlines, Inc.*, No. 1:17-cv-05172 (E.D.N.Y.); *Schmidt v. Jaguar Land Rover North America LLC*, No. 2:18-cv-08528 (D.N.J.); *Henning v. Luxury Brand Partners LLC*, No. 3:22-cv-07011 (N.D. Cal.); *Bentley, et al. v. LG Electronics USA, Inc.*, No. 2:19-cv-13554 (D.N.J.).

# **Exhibit A**

**From Name: Cash App Security Settlement Administrator**

**From Email: [Info@cashappsecuritysettlement.com](mailto:Info@cashappsecuritysettlement.com)**

**Subject: Notice of Late Claim Denial in the Cash App Security Settlement**

**CASH APP SECURITY SETTLEMENT**

**LATE CLAIM DENIAL LETTER**

**CLAIM ID: [CLAIM #]**

**[FIRST NAME] [LAST NAME]**

We received your Claim Form in the *Salinas, et al. v. Block, Inc. and Cash App Investing, LLC* Settlement. Your claim was received after the November 18, 2024 claim filing deadline. Your submitted claim was reviewed and was determined to be ineligible for any claimed losses. For these reasons your claim has been denied.

Sincerely,

Cash App Security Settlement

Settlement Administrator

[info@cashappsecuritysettlement.com](mailto:info@cashappsecuritysettlement.com)

# **Exhibit B**



**From Name: Cash App Security Settlement Administrator**  
**From Email: [Info@cashappsecuritysettlement.com](mailto:Info@cashappsecuritysettlement.com)**  
**Subject: Notice of Deficient Claim in the Cash App Security Settlement**

**CASH APP SECURITY SETTLEMENT**  
**CLAIM DEFICIENCY LETTER**

**CLAIM ID: [CLAIM #]-DEF**  
**CONFIRMATION CODE: [CODE]**  
**[FIRST NAME] [LAST NAME]**

We received your Claim Form in the *Salinas, et al. v. Block, Inc. and Cash App Investing, LLC* Settlement. After review, your Claim was determined to be Deficient for the following reason(s):

\_\_\_\_ Deficiency Reason 1

\_\_\_\_ Deficiency Reason 2

\_\_\_\_ Deficiency Reason 3

\_\_\_\_ Deficiency Reason 4

**If you wish to cure your Deficient Claim, you must respond by xx xx, 2025.** Please submit your deficiency response on the Settlement Website, [www.CashAppSecuritySettlement.com](http://www.CashAppSecuritySettlement.com) using the above Claim ID and Confirmation Code. Your response should address all issues noted above and include any documentation or information that was missing from your original claim. If you do not respond by **xx xx, 2025**, your claim will be Denied. Alternatively your deficiency response can be mailed to the Settlement Administrator at:

Cash App Security Settlement Administrator  
Attn: Deficiency Responses  
1650 Arch Street, Suite 2210  
Philadelphia, PA 19103

Deficiency responses mailed to the Settlement Administrator **must be postmarked by XX XX, 2025.**

For more information about this Settlement, you may view the Settlement Agreement and FAQs by visiting [www.cashappsecuritysettlement.com](http://www.cashappsecuritysettlement.com) or calling 1-866-615-9740. In particular, please note that the definitions of the terms Out-of-Pocket Losses, Transaction Losses, Unauthorized Account Events, Data Security Incident, and Lost Time can be found in the Settlement Agreement, which is located at the Important Documents tab of the settlement website, and additional information regarding what an Unauthorized Account Event is can be found on the settlement website at FAQ No. 6.

Sincerely,

Cash App Security Settlement  
Settlement Administrator  
[info@cashappsecuritysettlement.com](mailto:info@cashappsecuritysettlement.com)